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7/5/06
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**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

LISA S. BLACK,

Plaintiff,

vs.

**JIM BREWER, individually and in his
official capacity as Acting Principal of
Hopwood Junior High School,
COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS
PUBLIC SCHOOL SYSTEM, and JOHN
AND/OR JANE DOE,**

Defendants.

CIVIL ACTION NO. 05-0038

**REQUEST FOR ADMISSIONS
AND SPECIAL INTERROGATORY**

**TO: COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS PUBLIC
SCHOOL SYSTEM AND ITS COUNSEL OF RECORD**

COMES NOW Plaintiff Lisa S. Black, by and through counsel, and makes the following discovery requests of Defendant Commonwealth of the Northern Mariana Islands Public School System. Pursuant to the Federal Rules of Civil Procedure, Rule 36(a), you are requested to answer the following Requests for Admission in writing and under oath, and return said answers within thirty (30) days at O'Connor, Dotts & Banes at the 2nd Floor of the Nauru Building, Susupe, Saipan, MP 96950.

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Office of the Attorney General
Civil Division
Date: 7/5/06
Time: 3:48 PM
Rec'd by: [Signature]

I.

INSTRUCTIONS AND DEFINITIONS

1. These DISCOVERY REQUESTS are to be deemed continuing and YOU and YOUR attorney are under a duty to supplement your responses if YOU or any of YOUR employees, agents, or attorneys obtain additional information as to any of the matters inquired of herein.

2. If in responding to these DISCOVERY REQUESTS YOU encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous and the construction used in responding. If for any reason additional space is necessary in answering any Request, complete the answers on an additional sheet bearing the same number as the number of the Request which is being answered.

3. In responding to this or these discovery request(s), YOU must make a diligent search of YOUR records and other DOCUMENTS in YOUR possession or available to YOU, including information which is in the possession of YOUR attorneys, investigators for YOUR office, employees, representatives and agents, and not merely such information known to YOU or YOUR own personal knowledge.

4. If an interrogatory or document request has sub-parts, respond to each part separately and in full so that YOUR response is understandable. Do not limit YOUR response to the request as a whole.

1 5. Each written response shall state, with respect to each item or category, that inspection
2 and related activities will be permitted as requested, unless the request is objected to, in which
3 event the reasons for objection shall be stated. If the objection is made to a part of an item or
4 category, the part shall be specified.

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7 6. If any of the Requests cannot be answered in full, please answer to the extent possible,
8 specifying the reasons for YOUR inability to answer the remainder and stating whatever
9 information or knowledge YOU have concerning the unanswered portion.

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11 7. Throughout these Requests, including the definition of terms, words used in the singular
12 include the plural. Whenever the word "or" appears herein, the meaning intended is the logical
13 inclusive "or", i.e. "and/or". Whenever the word "each" appears herein, the meaning intended
14 is "each and every".
15

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17 8. For each response to this request that is withheld under a claim of privilege or
18 work-product immunity, provide a statement under oath by a person having knowledge setting
19 forth as to each response withheld the nature and reason for such objection and to the extent
20 possible, all information that is not privileged.
21

22
23 9. Throughout these DISCOVERY REQUESTS, including the definition of terms, words
24 used in the singular include the plural. Whenever the word "or" appears herein, the meaning
25 intended is the logical inclusive "or", i.e. "and/or". Whenever the word "each" appears herein,
26 the meaning intended is "each and every".
27
28

1 10. State whether the information furnished is within the personal knowledge of the person
2 answering and, if not, the identity, if known, of each person of whom the information is a
3 matter of personal knowledge.
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6 11. Where knowledge of information is requested, such request includes the knowledge of
7 information of Defendant Island Movers, Inc, as well as its officers, agents, employees and
8 attorneys. If more than one person is listed in answer to an interrogatory, each subsequent
9 answer must identify which person supplied that answer and all persons so listed must sign the
10 answers under oath.
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13 12. If any of the DISCOVERY REQUESTS cannot be answered in full, please answer to
14 the extent possible, specifying the reasons for your inability to answer the remainder and stating
15 whatever information or knowledge YOU have concerning the unanswered portion.
16

17 13. "YOU" and "YOUR" include the person(s) to whom these requests are addressed, and
18 all of such person's predecessors, successors, assigns, agents, employees, attorneys, and
19 insurance companies, and each of them, and all other persons acting or purporting to act on
20 behalf of Plaintiff.
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23 14. "PERSON" includes any natural person, firm, association, organization, partnership,
24 business, trust, corporation or public entity.
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1 15. Each of these definitions and instructions is hereby incorporated into each of the
2 Requests for Admission to which it pertains.

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4 16. The documents identified in this Request for Admissions are available for your
5 inspection and copying at any time you reasonably request.
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8 **II.**

9 **REQUEST FOR ADMISSION**
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11 1. **First Request for Admission:** PLEASE ADMIT that the documents that YOU
12 have produced, Bates numbers 000001 to 001915, are accurate copies of original documents,
13 kept in the ordinary course of business, and that other than the possible objection on the basis
14 of relevance, YOU have no objections to the admission of Bates numbers 000001 to 001915
15 into evidence at trial.
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18 **III.**

19 **SPECIAL INTERROGATORY**
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22 If you do not admit Request for Admission Number 1, then you must answer the
23 following interrogatory:
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25 //
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1 **Interrogatory No. 7 :** To the extent YOU contend the admission into evidence at trial
2 of any of the documents, Bates numbers 000001 to 001915 is objectionable, other than based
3 upon an objection of relevance, PLEASE STATE:

- 4 a. The particular document by Bates number that you object to
5 admission into evidence at trial; and
6
7 b. The basis of your objection.

8
9 Dated this 3 day of July, 2006.

10
11 Respectfully submitted,

12 O'CONNOR BERMAN DOTTS & BANES
13 Attorneys for Lisa S. Black

14
15
16 By: 
17 MICHAEL W. DOTTS (F0150)